

22 cr 82 kmm

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. __

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 2252(a)(4)(B)

v.

18 U.S.C. § 2252(b)(2)

18 U.S.C. § 2253(a)

JUSTIN JOHN MITCHELL,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

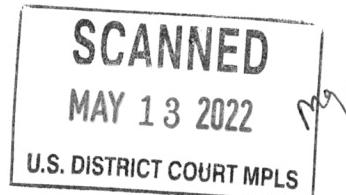
COUNT 1

(Possession of Child Pornography)

On or about January 7, 2022, in the State and District of Minnesota, the Defendant,

JUSTIN JOHN MITCHELL,

having been previously convicted under the laws of the State of Minnesota—in or about July 2015, in Ramsey County, Minnesota, for Possession of Pornographic Work Involving Minors (Minn. Stat. § 617.247.4(a)), and in or about November 2018, in Ramsey County, Minnesota, for Possession of Pornographic Work Involving Minors by Registered Predatory Offender (Minn. Stat. § 617.247.4(b))—did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of minors, including



United States v. Justin John Mitchell

prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer video files:

1. File name: d411db6d27684573_0_embedded_1.jpg. Image file depicting a naked prepubescent girl with her legs spread and exposing her genitalia. There is an adult penis near her genitalia.
2. File name: 86f1fb19f698ccb8_0_embedded_1.jpg. Image file depicting a naked adult male anally penetrating a prepubescent child.
3. File name: 113c4fd9c79efa3b_0_embedded_1.jpg. Image file depicting a naked pubescent girl lying down with her legs spread and exposing her genitalia to the camera.
4. File name: 77_d.mp4. Video file approximately one minute, 32 seconds long depicting a naked prepubescent girl sitting on a bathroom room and rubbing her genitalia. The girl then anally penetrates herself with a foreign object.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT 2
(Possession of Child Pornography)

On or about August 7, 2019, in the State and District of Minnesota, the Defendant,

JUSTIN JOHN MITCHELL,

having been previously convicted under the laws of the State of Minnesota—in or about July 2015, in Ramsey County, Minnesota, for Possession of Pornographic Work Involving Minors (Minn. Stat. § 617.247.4(a)), and in or about November 2018, in Ramsey County, Minnesota, for Possession of Pornographic Work Involving Minors by Registered Predatory Offender (Minn. Stat. § 617.247.4(b))—did knowingly possess one or more matters which contained visual depictions that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and

United States v. Justin John Mitchell

affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer files:

1. File name: ce-485.mp4. Video file approximately one minute, 45 seconds long depicting a naked prepubescent girl sitting on a floor rubbing and slapping her genitalia. The girl rubs a foreign object against her genitalia and then digitally penetrates herself with her fingers
2. File name: Collection1-Video042.8_yo_fuck_anal_2_scene_fuck_anal_.avi. Video file approximately five minutes, 37 seconds long depicting a naked prepubescent girl straddling a naked adult male who vaginally penetrates her with his penis. He then ejaculates on the girl's buttocks.
3. File name: Collection1-Video147.New_sugar_03.avi. A video file approximately 25 seconds long depicting an adult male using his penis to vaginally penetrate a prepubescent girl.
4. File name: Collection1-Video197.[Redacted]Ass_fucking_and_sucking_anal.wmv. Video file approximately five minutes, five seconds long depicting a pubescent girl performing oral sex on an adult male. The male then vaginally penetrates the girl with his penis.
5. File name: dj-968.mp4. Video file approximately 10 minutes, 31 seconds long depicting a naked pubescent girl and a naked prepubescent girl lying on top of each other. The older girl then performs oral sex on the younger girl. There are numerous closeups of the girl's genitalia during the video.
6. File name: my_fav_jbs_aab0335.avi. Video file approximately nine minutes, 12 seconds long depicting a pubescent girl performing oral sex on and masturbating an adult male.

all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

United States v. Justin John Mitchell

FORFEITURE ALLEGATIONS

Counts 1 and 2 of this Information are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the Defendant,

JUSTIN JOHN MITCHELL,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

1. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including, but not limited to:
 - a. Amazon Kindle Fire 7 (9th generation), model KFMUWI;
 - b. Samsung Galaxy Tab A 7.0, GSM SM-T280, Android ID: 4b96c1634ec80ea5;

United States v. Justin John Mitchell

c. Samsung Galaxy Cell Phone SM-G965U, Android ID:

8a374726ff1358da, IMEI 358215090601461; and

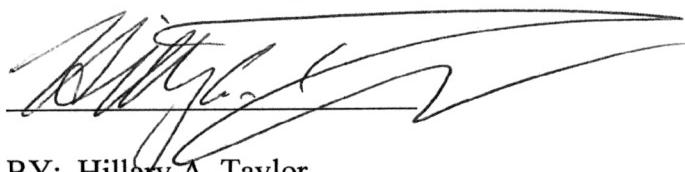
d. Amazon tablet, model KFKAWI, Android ID 10bbfe5347080699.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and 2253(a).

Dated: May 13, 2022

ANDREW M. LUGER
United States Attorney



BY: Hillary A. Taylor
Special Assistant United States Attorney
Attorney ID No. 0398557